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June 3, 2002

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.T.E. 01-34 – Special Access Services Investigation

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find one (1) copy of Verizon Massachusetts' ("Verizon MA") Exhibit List, as revised at the May 30th hearing.

As requested by the Department, Verizon MA is also providing two (2) copies of the complete Verizon MA Exhibit No. 4. Tr. 509-511. That attached exhibit includes the itemized bill page for both AT&T Broadband bills marked for identification by Verizon MA at the May 30th hearing.¹ The itemized bill page identifies the type of service (*i.e.*, "commercial" business), the level of service (*i.e.*, basic cable and expanded cable), and the applicable equipment or facilities (*e.g.*, remotes, cable or converter box – addressable, and outlets). This is comparable to the type of information provided by AT&T Broadband on monthly cable bills for its residence (or non-commercial) customer accounts.

¹ The first page of both AT&T Broadband bills was presented by Verizon MA at the May 30th hearing. As indicated by Verizon MA counsel at that hearing, the first page of both bills identify the locations where those services are provided (*i.e.*, 125 High St., Boston, Massachusetts, and 251 Locke Drive, Marlboro, Massachusetts), and the customer of record (*i.e.*, Verizon).

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Based on the information provided hereto, Verizon MA's Exhibit No. 4 illustrates that AT&T Broadband has a physical presence at business locations, which contradicts AT&T's statement that "AT&T Broadband does not even have facilities linking its existing cable plant to Massachusetts businesses." Exh. ATT-2, at 22 n.7; Tr. 503. This also relates directly to arguments made by Verizon MA in its testimony (Exh. VZ MA 3, at 15 n.9) regarding potential alternatives to special access services. Accordingly, Verizon MA Exhibit 4 should be admitted into evidence. Objections to this exhibit are unfounded and would more appropriately apply to the *weight* given to the evidence, not to its admissibility.

Thank you for your assistance in this matter.

Very truly yours,

Barbara Anne Sousa

Enclosure

cc: Joan Foster-Evans, Esquire, Hearing Officer (2)
Michael Isenberg, Esquire, Director – Telecommunications Division
Attached D.T.E. 01-34 Service List